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*Class Counsel for Lead Plaintiffs Julia Junge and
Richard Junge and the Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JULIA JUNGE and RICHARD JUNGE, on
behalf of themselves and a class of similarly
situated investors,

Plaintiffs,

v.

GERON CORPORATION and JOHN A.
SCARLETT,

Defendants.

Case No. 3:20-cv-00547-WHA (DMR)

Class Action

(Consolidated with Case No. 3:20-cv-01163-
WHA); (Related to Case No. 3:20-cv-02823-
WHA; 3:22-mc-80051-WHA)

**LEAD PLAINTIFFS' NOTICE OF
DEADLINE COMPLIANCE
REGARDING MAILING OF
SUPPLEMENTAL SETTLEMENT
NOTICE IN RESPONSE TO ECF NO.
299**

1 TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:

2 The June 1, 2023 Order Requesting Statement of Deadline Compliance (ECF No. 299)
 3 requests that “counsel shall please file a statement certifying that they have complied with the
 4 deadline set out in the order approving short form notice, namely, that ‘all notices, including those
 5 mailed by broker dealers, must be mailed to class members by no later than Monday, May 1, 2023’
 6 (Dkt. No. 282). Please also detail the measures taken, if any, to ensure all effected broker dealers
 7 have complied with the mailing deadline.”

8 Lead Counsel certifies that it has complied with the mailing deadline based on the following:

9 1. On May 2, 2023, Lead Counsel filed Lead Plaintiffs’ Transmittal of the Declaration
 10 of Stephanie Amin-Giwner Regarding Mailing of Supplemental Settlement Notice. ECF No. 294
 11 (“May 2 Notice”).

12 2. The May 2 Notice transmitted the May 2, 2023 Declaration of Stephanie Amin-
 13 Giwner Regarding Mailing of Supplemental Settlement Notice (the “May 2 Amin-Giwner Decl.”).
 14 ECF No. 294-1.

15 3. The May 2 Amin-Giwner Decl. states the steps undertaken by Epiq Class Action and
 16 Claims Solutions, Inc. (“Epiq”) to mail the Supplemental Settlement Notice on or before May 1,
 17 2023.

18 4. Epiq directly mailed 82,962 Supplemental Settlement Notices on or before May 1,
 19 2023 to “all potential Class Members in Epiq’s database dedicated to this Settlement who, based
 20 upon Epiq’s records, did not already file a timely claim.” May 2 Amin-Giwner Decl., ¶10.

21 5. Further, Epiq transmitted copies of the Supplemental Settlement Notices to three
 22 nominees or broker-dealers (CIBC, Goldman Sachs and Broadridge (US)) that originally elected to
 23 have Epiq send them a bulk mailing of the Settlement Notices. *Id.*, ¶13.

24 6. CIBC mailed 200 Supplemental Settlement Notices to potential Class Members,
 25 Goldman Sachs mailed 246 Supplemental Settlement Notices to potential Class Members, and
 26 Broadridge (US) mailed 45,351 Supplemental Settlement Notices to potential Class Members. *Id.*,
 27 ¶¶15, 17, 19. Epiq confirmed in writing with each of these three nominees or broker dealers that
 28 the Supplemental Settlement Notices were mailed on or before May 1, 2023. *Id.*, ¶¶14-19.

1 Lead Counsel is available to answer any further questions the Court may have in advance of
2 the August 24, 2023 hearing.

3
4 DATED: June 5, 2023

Respectfully submitted,

KAPLAN FOX & KILSHEIMER LLP

By: /s/ Kathleen A. Herkenhoff
Kathleen A. Herkenhoff

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